NPDES INSPECTION REPORT

CITY OF MACKAY WASTEWATER TREATMENT FACILITY

MACKAY, IDAHO

September 22, 2011

Prepared by:
William Teuscher PE
Idaho Department of Environmental Quality (DEQ)
Idaho Falls Regional Office

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(Unless otherwise noted, all details in this inspection report were obtained from conversations with facility personnel Ken Day, Public Works Supervisor.

I. Facility Information

Facility Name:

City of Mackay Wastewater Treatment Plant (Facility)

Facility Type:

Sewage Treatment Plant

Facility Location:

Off White Knob Street, ~ 3/4 mile south of City Hall

Latitude: 43° 54' 7.91"N

Longitude: 113° 36' 39.86"W

Mailing Address:

P.O. Box 509

Mackay, Idaho 83251

Facility Contacts:

Ken Day, Public Works Supervisor

Otto Higbee, Mayor

Facility Numbers:

Ph: (208) 588-2274 (City Hall)

Permit Number:

ID-002302-7

Permit Status:

Permit effective Date: June 1, 2004

Permit expiration Date: May 31, 2009.

Current permit is administratively extended per May 18

2009 EPA letter.

SIC Code:

4952

II. Inspection Information

Inspection Date/Time:

September 22, 2011

10:00 AM to 1:30 PM

Inspectors:

William Teuscher PE (DEQ)

Weather:

Sunny 68° F

Purpose:

Determination of compliance with the NPDES Permit and

the Clean Water Act.

III. Owner and Operator Information

The Facility is currently owned and operated by the City of Mackay, Idaho. Ken Day is the current certified operator for the wastewater treatment and collection facility.

IV. Inspection Entry

This was an announced inspection. The City of Mackay (City) was contacted by me on September 6, 2011 to schedule the inspection for September 22, 2011.

I arrived at City Hall at 10:00AM and met with Ken Day the Public Works Supervisor. I presented my credentials to Mr. Day. I told him that the purpose of the visit was to perform an NPDES inspection of the wastewater treatment facility for EPA. Mr. Day allowed me access to the facility. I was accompanied throughout the inspection by Mr. Day.

V. Inspection Chronology

On September 22, 2011, the inspection began with an entry interview, followed by a file review and a tour of the Facility. The Facility tour included an inspection of the treatment unit operations. The points of sampling for the influent and effluent flows were also reviewed and verified. As part of the file review, the Facility's Quality Assurance Plan (QAP), the Operations and Maintenance (O&M) Plan and discharge monitoring reports (DMRs) were reviewed. The NPDES permit was also reviewed to verify the self-monitoring efforts. The inspection then concluded with an exit interview.

VI. Background

The permit authorizes the Facility to discharge to the Big Lost River through outfall 001. According to Mr. Day, the Facility was last upgraded in 1988 to its current configuration.

In terms of the collection system all wastewater flows are gravity fed to one main lift station that pumps all wastewater flows to the wastewater treatment facility. Not much has changed to the collection system since its initial installation other than a few gravity collections lines have been added to accommodate very minimal growth and development over the years. The population and flows to the wastewater facility have not changed much.

VII. Scope of the Inspection

The scope of this inspection was to review monitoring activities, records and reports pertaining to the NPDES permit and to visually inspect the wastewater treatment unit processes, general operation and maintenance and self-monitoring of the system. The inspection also included visual inspection of outfall locations to the receiving waters.

This inspection did not evaluate the laboratory procedures because an offsite independent lab has been used for the lab analysis. The accuracy of the existing flow meters where not verified by flow monitoring. The operator's influent and effluent water quality sampling procedures were not evaluated.

VIII. Records Review

As part of the records review I examined the NPDES permit, 2010 and 2011 DMRs, associated lab sheets, Quality Assurance Plan (QAP), and the Operation and Maintenance (O&M) Manual for the treatment facility.

The NPDES permit was on file and available for my review. The NPDES permit required that the City submit the monthly DMRs to EPA and DEQ. There were no missing DMRs from the City files. DMRs from the DEQ file and the City files were compared for corresponding reported values for effluent concentrations and loadings. The January 2011 DMR was also reviewed for accuracy and proper reporting of all the NPDES permit limitations and monitoring requirements per Table 1 of the permit. One of the five e-coli bacteria samples taken for January 2011 exceeded the required preservation temperature 10° C. The January 19, 2011 e-coli sample was 13.8° C. A copy of the January 2011 DMR along with the associated lab sheets and Chain of Custody forms are found in Attachment B.

Also on record in the files was the required QAP which was completed and dated March 2009 as required by the NPDES permit. The current O&M manual was also presented to me upon my request. The O&M manual was completed August of 1988. During the review of the QAP it was noted that the holding time for the e-coli sample was listed as 30 hours. This holding time is not correct (see attachment C for title page and page 20 of the QAP). Part II.C of the Permit specifies that monitoring must be conducted according to test procedures approved under federal regulations at 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 503. Per this Federal Register/Vol.72 No. 57 Table II the required holding time for e-coli samples is 6 hours.

I mentioned that the QAP should be modified to incorporate the proper testing procedure and holding times for all wastewater parameters. Mr. Day mentioned that the QAP had listed some of the testing procedures that are required for public drinking water systems. Even though the QAP had listed the E-coli sample holding time to be 30 hours the actual Chain of Custody form reflected that the e-coli samples taken for the month of January 2011 was held within the required 6 hour holding time. (See attachment B January 2011 Chain of Custody forms).

The City's file also showed that their-application for an updated NPDES permit had be submitted to EPA April 3, 2009 along with the surface water quality monitoring report. EPA had administratively extended the current permit (See EPA letter to City dated May 18, 2009 in Attachment D).

I asked Mr. Day if he has retained all records pertaining to the NPDES permit for five years and he said he had.

IX. Waste Management Process

The Facility currently utilizes a lagoon system to treat wastewater. The system consists of two lagoons. The first lagoon is equipped with three floating surface aerators and the second lagoon cell is a facultative cell. After the lagoon treatment the effluent is then disinfected with chlorine gas. The effluent flows through a buried circular contact chamber and is then monitored by way of a stilling basin, float level monitor controlled by a V-notch weir. The effluent from the Facility is discharged to the Big Lost River through outfall 001. The out fall consists of an open channel for about 200 feet and then is piped for about 150 feet to the Big Lost River where the pipe terminates above the river water level on the side of the river bank were riprap has been placed to dissipate the flow and prevent erosion to the river bank and stream bed.

Solids accumulate on the bottom of the lagoons and according to Mr. Day, the City has never removed any biosolids from the lagoons.

At the time of inspection, all treatment unit processes were operational. (See Facility Photographs in Attachment E). However, the aerators were not turned on and the Facility was not currently discharging. The aerators were turned off and flow from the lagoons to the discharge point was shut off so the City could perform seepage or leakage tests on the lagoons required by the State of Idaho Wastewater Rules, IDAPA 58.01.16.

I asked Mr. Day how often the flow meters are calibrated. He said that they are calibrated once a year and that he does the calibration himself. The Calibration for the influent flow meter is done by comparing the wet well draw down volume verse the recorded value on the influent meter. The effluent flow meter is calibrated by comparing the flow over the V-notch weir by measuring the water depth at the crest of the weir.

The lagoons had a lot of cattails growing around the dike areas. Cell 1 of the lagoons was covered with a mat of duckweed. Mr. Day mentioned that he had not had the opportunity to spray the cattails or the duckweed this year (see Facility Photographs in Attachment E).

X. Facility Sample Collection and Analyses

The sample collection and analyses duties at the Facility are conducted by Mr. Day. The Chain of Custody forms showed that Mr. Day was the one collecting the wastewater samples required by the NPDES Permit. He also verified that he was the one who conducts the onsite sampling and testing of pH and chlorine residual.

The DMRs are filled out by Mr. Day and then sent to Mayor Otto Higbee for his signature as the Principle Executive Officer. The DMRs for 2011 were reviewed up to the month of August 2011. All 2010 DMRs were also reviewed during this

inspection. All of the reported effluent parameters for 2010 and 2011 were within the required NPDES permit loadings and concentration limits.

The parameters analyzed onsite using monitoring equipment include flow, pH, total residual chlorine, dissolved oxygen and temperature.

Biochemical oxygen demand (BOD), total suspended solids (TSS), *Escherichia coli* (E. coli), total phosphorus and total ammonia are analyzed by outside laboratories. Magic Valley Labs (MVL) in Twin Falls, ID analyzes the samples for all the parameters except for E. coli. The Pocatello, ID laboratory of MVL conducts the E. coli analysis. The final certificate of analysis is provided to the City by MVL - Twin Falls.

I asked Mr. Day where the influent and effluent samples are taken during the month. Mr. Day said that the influent samples are taken at the main lift station prior to the lagoons after all gravity collection lines converge. The effluent samples are taken at the flow control structure at the V-notch weir outfall prior to discharge to the open ditch adjacent to the chlorination building.

XI. Areas of Concern

This inspection included a review of the treatment system, the sample collection and analyses procedures, and documentation required by the Permit. During the course of this inspection, I observed and identified the following areas of concern:

- A. Quality Assurance Plan (QAP) Part I.D of the Permit specifies that the permittee must develop and implement a quality assurance plan (QAP) for all monitoring required by the Permit. The current QAP identified the incorrect holding time (30 hours) for ecoli bacteria. The QAP should be modified to show 6 hours maximum holding time for e-coli bacteria per 40 CFR Part 136 or, in the case of sludge use or disposal, approved per 40 CFR Part 503. All other testing methods, preservation techniques should be reviewed and updated to assure compliance to 40 CFR Part 136 and 40 CFR Part 503.
- B. Monitoring Procedures and Proper Operation and Maintenance Part II.C of the Permit specifies that monitoring must be conducted according to test procedures approved under federal regulations at 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 503. Part III.E of the Permit specifies that the permittee must at all times properly operate and maintain all facilities and systems of treatment and control. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.

Based upon the January 2011 DMR and applicable chain of custody form for the January 19, 2011 sample from Magic Valley Labs, the E. coli bacteria sample temperature was 13.8 °C which exceeded the 10 °C preservation temperature required by EPA approved methods per the Federal Register /Vol 72, No.57/ March

26, 2007/Rules and Regulations Table II. The exceedance of the preservation temperature was for only one (1) of the five (5) e-coli bacteria samples taken for the month of January 2011.

XII. Additional Observations

A. <u>Proper Operation and Maintenance</u> Part III.E of the Permit specifies that the permittee must at all times properly operate and maintain all facilities and systems of treatment and control. Vegetation including duckweed and cattails are growing in lagoon #1 (See Attachment C for photographs of the treatment lagoons).

XIII. Inspection Sampling

Samples were not collected by DEQ at the time of this inspection.

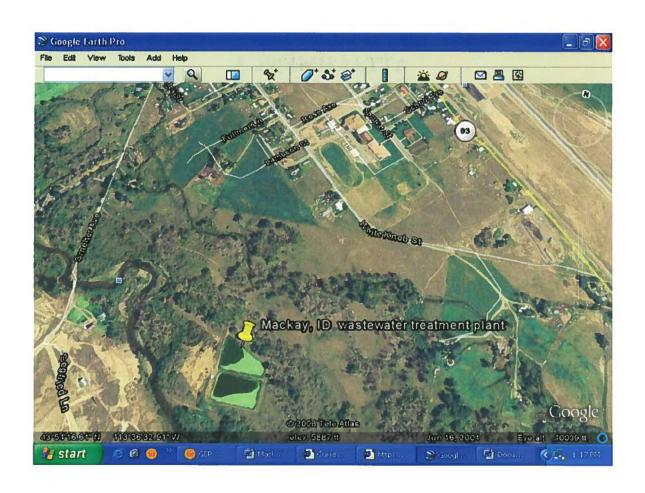
Report Completion Date: September 22, 2011

Lead Inspector Signature: Mille Jusche

ATTACHMENT A

Vicinity Map

City of Mackay Wastewater Treatment Facility Mackay, Idaho (September 22, 2011 Inspection)



ATTACHMENT B

January 2011 DMR, Chain of Custody forms and Lab Analysis Report

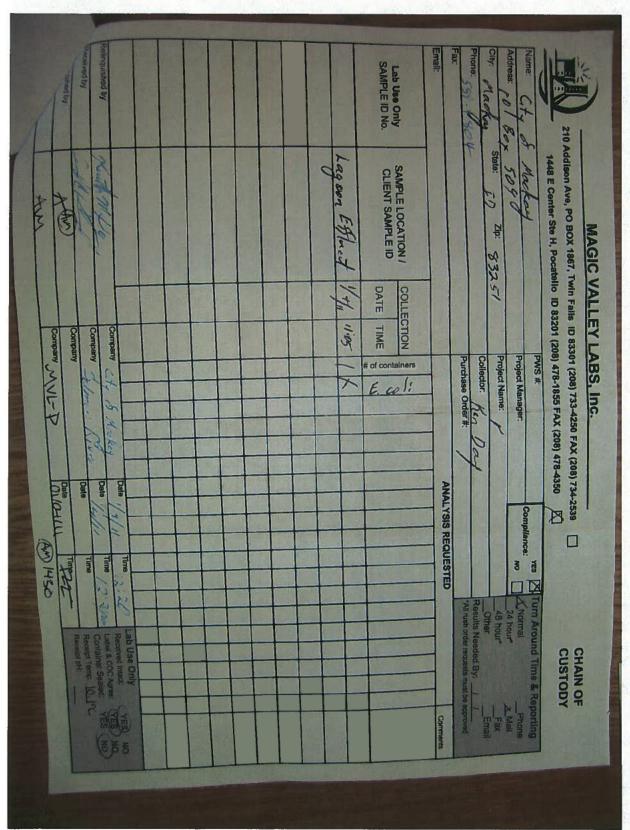
City of Mackay Wastewater Treatment Facility Mackay, Idaho (September 22, 2011 Inspection)

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Jan 2011 DMR Page 1 (Photographed September 22, 2011 by William Teuscher)

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Jan 2011 DMR Page 2 (Photographed September 22, 2011 by William Teuscher)



Chain of Custody 1/4/11 (Photographed September 22, 2011 by William Teuscher)



Laboratory Supervisor – Brenda Ellis LAB ID# ID000964

CITY OF MACKAY ATTN: KEN DAY PO BOX 509 **MACKAY, ID 83251**

NON-DRINKING WATER ANALYSIS REPORT

Date Collected: 01/04/11 Time Collected: 11:05

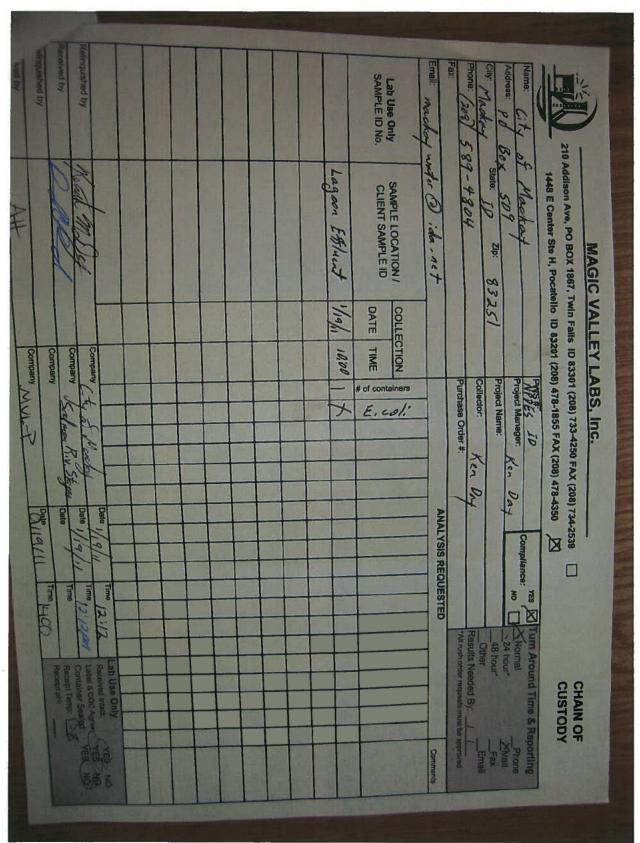
Location: LAGOON EFFLUENT

Date Received: 01/04/11 Time Received: 14:30

Collector: KEN DAY Chlorine Residual: 0.30

Sample #	Test / Method Code	Result	Date / Time Analyzed	Analyst
701-573	E. COLI/SM9223BQT/ COLISURE	MPN/100ML	01/06/11 10:00	AM

Lab Report 1/4/11 (Photographed September 22, 2011 by William Teuscher)



Chain of Custody 1/19/11 (Photographed September 22, 2011 by William Teuscher)



Laboratory Supervisor – Brenda Ellis LAB ID# ID000964

PWS # 7190032 CITY OF MACKAY ATTN: KEN DAY PO BOX 509 MACKAY, ID 83251

NON-DRINKING WATER ANALYSIS REPORT

Date Collected: 01/19/11 Time Collected: 10:00

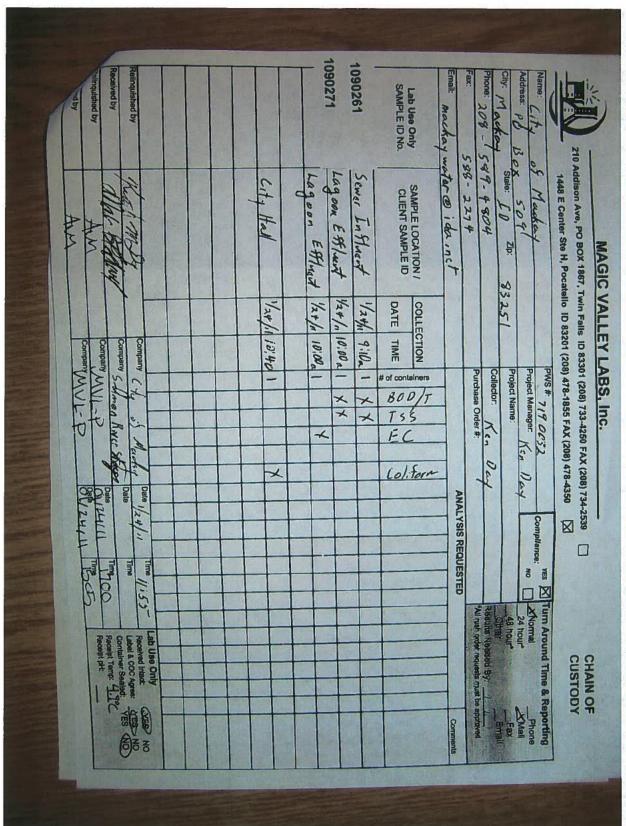
Location: LAGOON EFFLUENT

Date Received: 04/19/11 Time Received: 14:00

Collector: KEN DAY Chiorine Residual: 0.40

Sample #	Test / Method Code	Result	Date / Time Analyzed	Analyst
701-577	E. COLI /SM9223BQT/ COLISURE	<1 MPN/100ML	01/20/11 15:00	AM

Lab Report 1/19/11 (Photographed September 22, 2011 by William Teuscher)



Chain of Custody 1/24/11 (Photographed September 22, 2011 by William Teuscher)



Laboratory Supervisor – Brenda Eilis LAB ID# ID000964

PWS # 7190032 CITY OF MACKAY ATTN: KEN DAY PO BOX 509 MACKAY, ID 83251

NON-DRINKING WATER ANALYSIS REPORT

Date Collected: 01/24/11 Time Collected: 10:00

Location: LAGOON EFFLUENT

Date Received: 01/24/11 Time Received: 15:05

Collector: KEN DAY Chlorine Residual: 0.40

Sample #	Test / Method Code	Result	Date / Time Analyzed	Analyst
701-578	E. COLI/SM9223BQT/ COLISURE	<1 MPN/100ML	01/25/11 16:30	AM

Lab Report 1/24/11 (Photographed September 22, 2011 by William Teuscher)

MAGIC VALLEY LABS 210 Addison Ave / PO Box 1867 Twin Falls ID 83303-1867 Phone: (208) 733-4250 Fax: (208) 734-2539 KEN DAY MACKAY CITY OF PO BOX 509 MACKAY ID 83251 Collection Date 1/24/2011 Received Date 1/24/2011 Location Collection Time 10:00 AM Received Time 3:05 PM LAGOON EFFLUENT Results in mg/L Date Analyzed Analyst Test / Method Code Sample # 1/31/2011 BOD SM5210B <3 JD 1090271 3 1/28/2011 JD TSS SM2540D 1090272 Signature

Lab Report 1/24/11 (Photographed September 22, 2011 by William Teuscher)

MAGIC VALLEY LABS

210 Addison Ave / PO Box 1867 Twin Falls ID 83303-1867 Phone: (208) 733-4250 Fax: (208) 734-2539

KEN DAY MACKAY CITY OF

PO BOX 509 MACKAY ID 83251

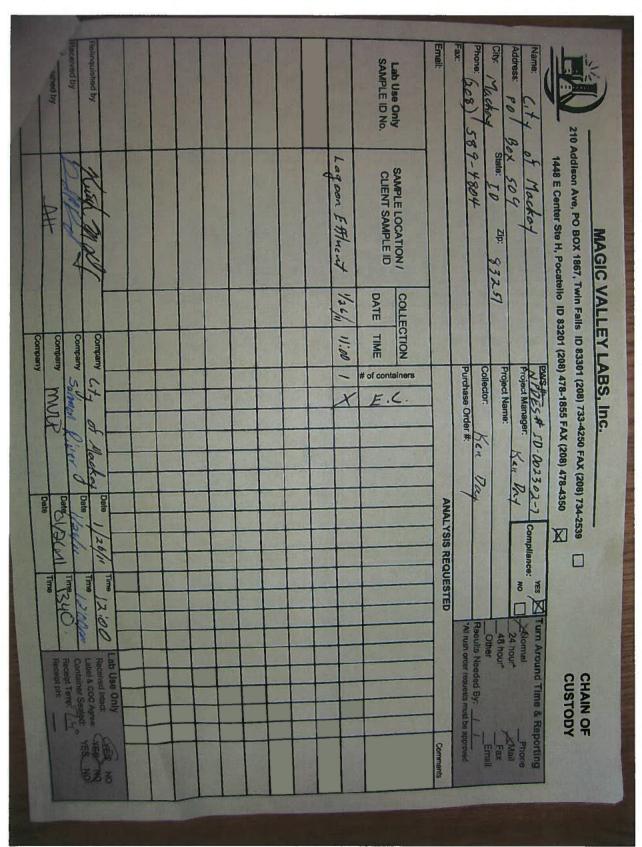
Collection Date	1/24/2011	Received Date	1/24/2011	Location
Collection Time	9:10 AM	Received Time	3:05 PM	SEWER INFLUENT

Sample #	Test / Method Code	Results in mg/L	Date Analyzed	Analyst
1090261	BOD SM5210B	124	1/31/2011	15
1090262	TSS SM2540D		110112011	JD
		213	1/28/2011	JD

Signature

Report Date: Tuesday, February 01, 2011

Lab Report 1/24/11 (Photographed September 22, 2011 by William Teuscher)



Chain of Custody 1/26/11 (Photographed September 22, 2011 by William Teuscher)



Laboratory Supervisor – Brenda Ellis LAB ID# ID000964

PWS # 7190032 CITY OF MACKAY ATTN: KEN DAY PO BOX 509 MACKAY, ID 83251

NON-DRINKING WATER ANALYSIS REPORT

Date Collected: 01/26/11 Time Collected: 11:00

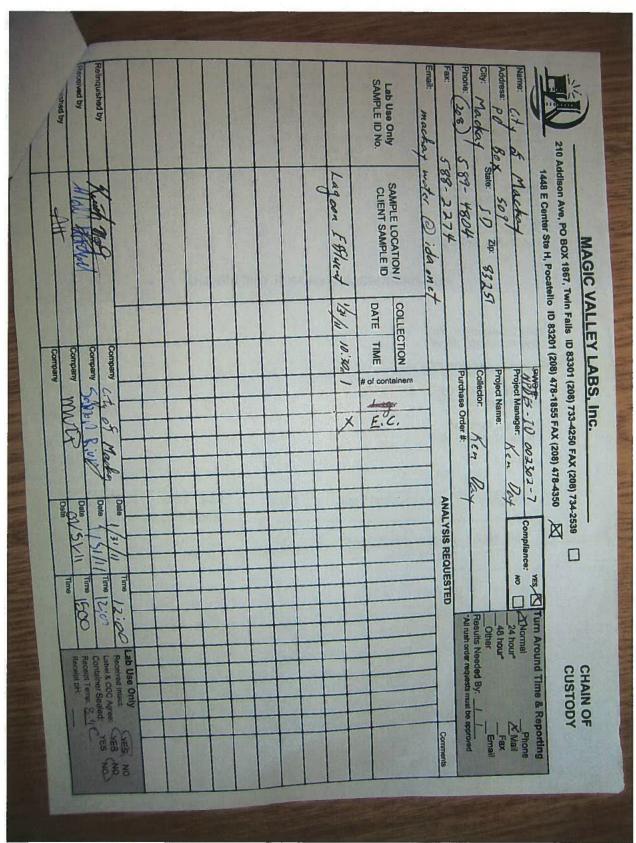
Location: LAGOON EFFLUENT

Date Received: 01/26/11 Time Received: 13:40

Collector: KEN DAY Chlorine Residual: 0.40

Sample #	Test / Method Code	Result	Date / Time Analyzed	Analyst
701-580	E. COLI /SM9223BQT/ COLISURE	<1 MPN/100ML	01/27/11 16:00	AM

Lab Report 1/26/11 (Photographed September 22, 2011 by William Teuscher)



Chain of Custody 1/31/11 (Photographed September 22, 2011 by William Teuscher)



Laboratory Supervisor – Brenda Ellis LAB ID# ID000964

PWS # 7190032 CITY OF MACKAY ATTN: KEN DAY PO BOX 509 MACKAY, ID 83251

NON-DRINKING WATER ANALYSIS REPORT

Date Collected: 01/31/11 Time Collected: 10:30

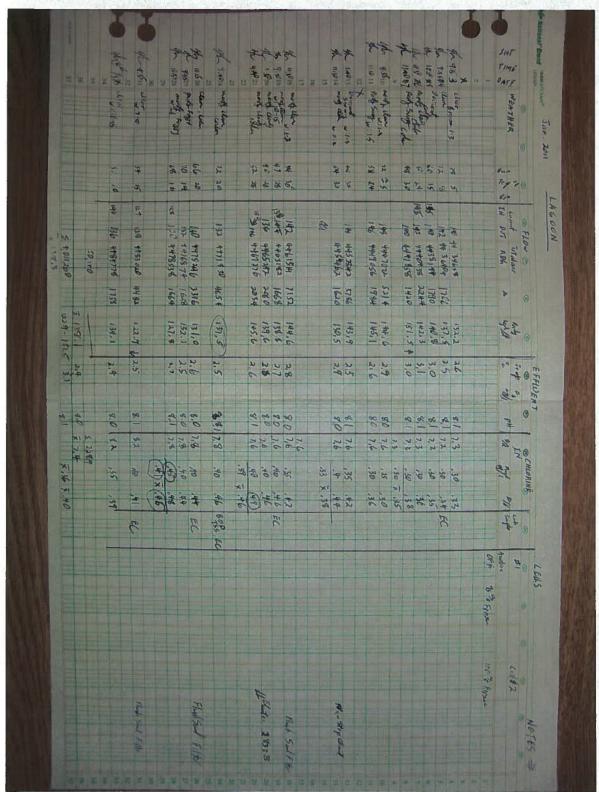
Location: LAGOON EFFLUENT

Date Received: 01/31/11 Time Received: 15:00

Collector: KEN DAY Chlorine Residual: 0.40

Sample #	Test / Method Code	Result	Date / Time Analyzed	Analyst
701-581	E. COLI /SM9223BQT/ COLISURE	<1 MPN/100ML	02/01/11 16:00	АН

Lab Report 1/31/11 (Photographed September 22, 2011 by William Teuscher)

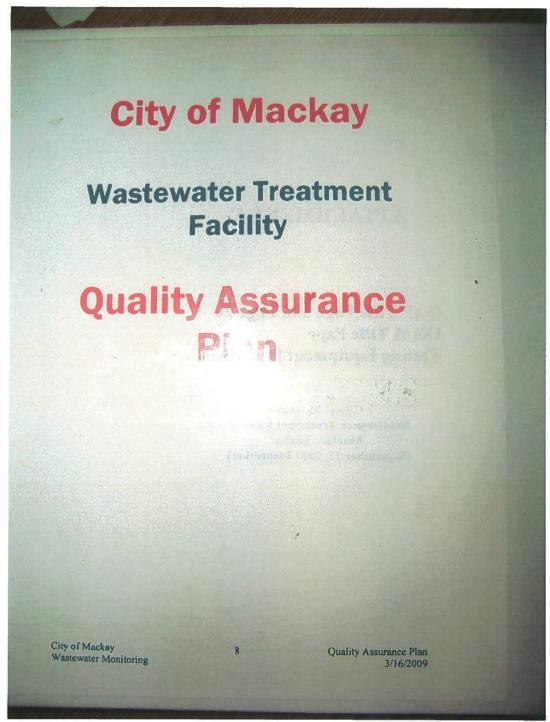


Raw data sheet for recording flow and other sampling results

ATTACHMENT C

QAP Title Page and Page 20 O&M Title Page Testing Equipment Data Sheets

> City of Mackay Wastewater Treatment Facility Mackay, Idaho (September 22, 2011 Inspection)



QAP Title pagePhotographed September 22, 2011
By William Teuscher

	Ortho Phosphorous Hach, EPA 365.1	100ml	250ml P		48 hrs
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	Soils				
	TCLP				
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	Total Phosphorous Hach, EPA 365.1	100ml		H ₂ SO ₄	28 days
	Potassium SM3111B (SM Ed. 20th)	1L		HNO ₃	6 months
	Selenium EPA 200.9	1L	ILP	HNO ₃	6 months
	Settable Solids EPA160.5	1L	1L P	Cool 4 C	7 days
	Silver SM3111B (SM Ed. 20th)	1L	1L P	HNO ₃	6 months
ľ	Silica EPA 370.1	100ml	125 ml P	none	48 hours
ı	Sodium SM3111B (SM Ed. 20th)	IIL	1LP	HNO ₃	6 months
	Dionex Sulfate EPA 300.0	100ml	125ml P	Cool 4 C	28 days
l	Sulfide EPA 376.2	1,00ml	Air tight amber glass	Cool 4 C	Immediate
	Surfactants (MBAS) EPA 425.1	300ml	500ml P		Immediate
Ì	FDS Meter EPA 120.1	1L	1LP	Cool 4 C	7 days
į	Temperature SM2550B (SM Ed. 20th)	100ml			Immediate
	hallium EPA200.9	1L	1LP	HNO ₃	6 months
į	TKN Gas Diffusion Alpkem PAI-DK03	100ml	250ml P	H ₅ SO ₄	28 days
ì	Total Coliform Bacteria/E. coli	150ml	150ml P S	Cool 4 C	30 hrs
٤	. Chromogenic Substrate SM9223B (19th ed.)	150ml	150ml PS	Cool 4 C	30 hrs
		150ml	150ml P S	Cool 4 C	30 hrs
	. Membrane filtration SM9222B/SM9221E (19th)		150ml P S	Cool 4 C	
	Control of the Contro	1L	1LP	Cool 4 C	

QAP page 20 (note holding time for E-Coli @ 30 hours)
Photographed September 22, 2011
By William Teuscher

CITY OF MACKAY, IDAHO

Operation and Maintenance Manual

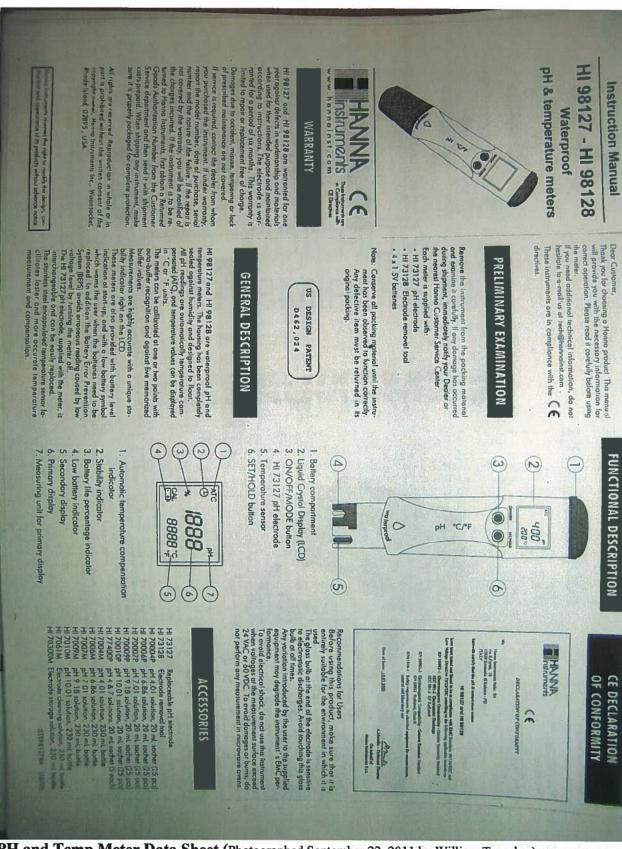
for

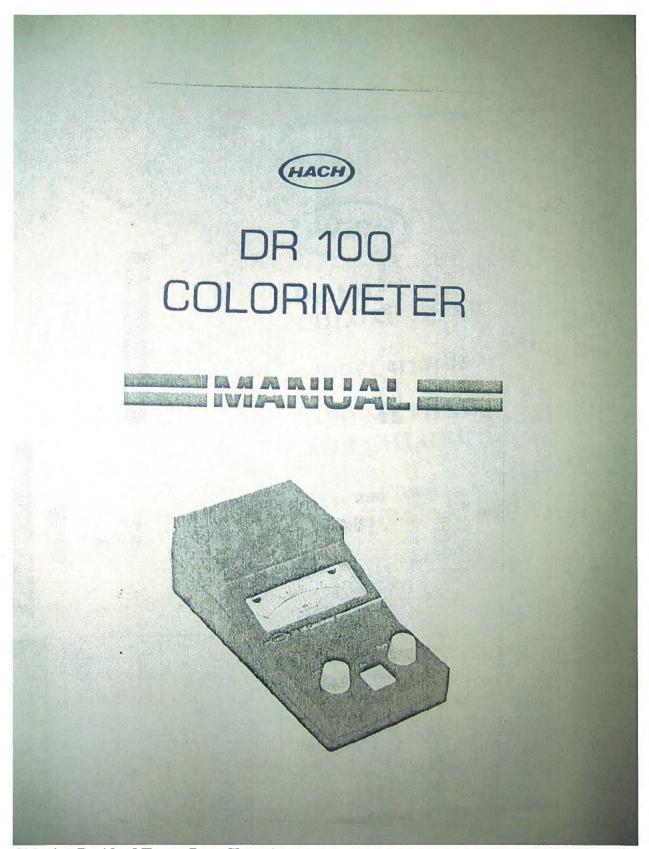
WASTEWATER TREATMENT FACILITY

AUGUST 1988

PORSOREM ASSOCIATES, P.A.

O&M Title Page (Photographed September 22, 2011 by William Teuscher)





Chlorine Residual Tester Data Sheet (Photographed September 22, 2011 by William Teuscher)

ATTACHMENT D

May 18, 2009 EPA Correspondence to City of Mackay And Cover Page of NPDES Permit

> City of Mackay Wastewater Treatment Facility Mackay, Idaho (September 22, 2011 Inspection)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10 1200 Sixth Avenue, Suite 900 Seattle, Washington 98101-3140

MAY 1 8 2009

Reply to Attn of: OWW-130

Kenneth Day Public Works Supervisor P.O. Box 509 Mackay, ID 83251-0509

Renewal of National Pollutant Discharge Elimination System (NPDES) Permit City of Mackay NPDES Permit No: ID-0023027

Dear Mr. Day:

The Environmental Protection Agency (EPA) received the above referenced NPDES application materials on April 13, 2009. We have completed our review of the application and have determined that it is complete. According to the federal regulation at 40 CFR 122.6(a), when a timely and complete application is received by EPA, and through no fault of the permittee, EPA does not reissue a new permit prior to the expiration date of the existing permit, then the permit remains fully effective and enforceable. Therefore, your existing permit will remain effective and enforceable until a new permit is issued to your facility.

Please note that EPA may request additional information during the development of the draft permit to clarify, modify, or supplement previously submitted material. If you have any questions, please contact the NPDES Permits Unit at (206) 553-0523.

Sincerely,

Michael J. Lidgard, Manager NPDES Permits Unit

May 18, 2009 EPA Correspondence to City of Mackay

(Photographed September 22, 2011 by William Teuscher)

United States Environmental Protection Agency Region 10 1200 Sixth Avenue Seattle, Washington 98101

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Clean Water Act, 33 U.S.C. §1251 et seq., as amended by the Water Quality Act of 1987, P.L. 100-4. the "Act",

The City of Mackay P.O. Box 509 Mackay, Idaho 83251

is authorized to discharge from a wastewater treatment facility located in Mackay, Idaho.

to receiving waters named Big Lost River,

in accordance with discharge point(s), effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective June 1, 2004.

This permit and the authorization to discharge shall expire at midnight, May 31, 2009.

Signed this day of Murch 2004

Randall F. Smith

Director

Office of Water, Region 10

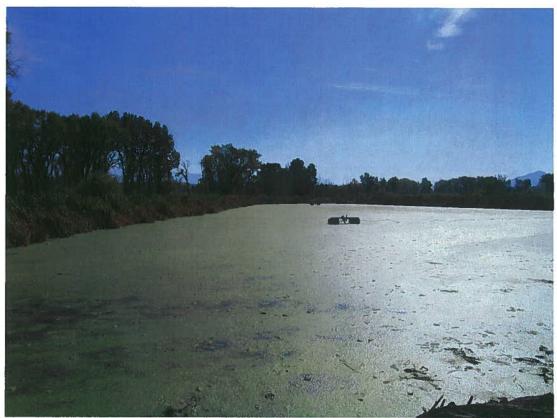
U.S. Environmental Protection Agency

Cover Page NPDES Permit (Photographed September 22, 2011 by William Teuscher)

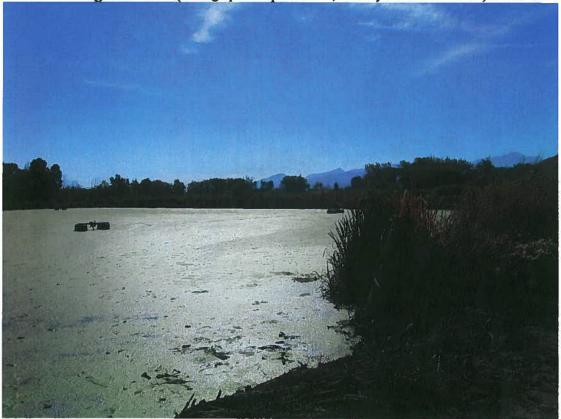
ATTACHMENT E

Facility Photograph Documentation

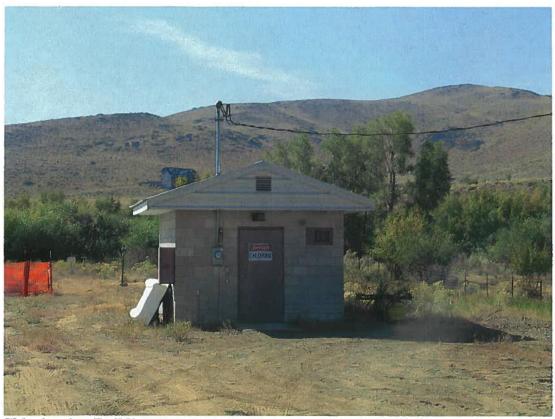
City of Mackay Wastewater Treatment Facility Mackay, Idaho (September 22, 2011 Inspection)



Lagoon Cell 1 (Photographed September 22, 2011 by William Teuscher)



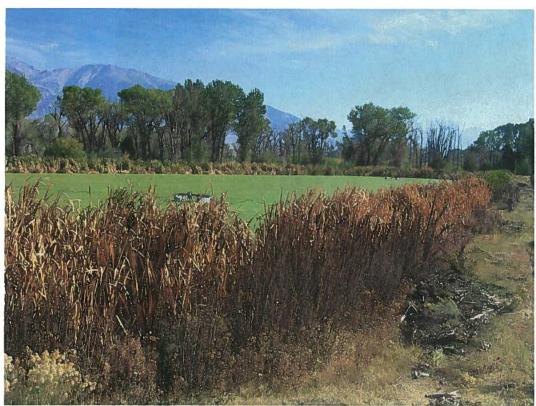
Lagoon Cell 1 (Photographed September 22, 2011 by William Teuscher)



Chlorination Building (Photographed September 22, 2011 by William Teuscher)



Interior Dike between Cells 1 and 2 (Photographed September 22, 2011 by William Teuscher)



Lagoon Cell 1 looking from north end of interior dike

(Photographed September 22, 2011 by William Teuscher)



Chlorination room North wall to right (Photographed September 22, 2011 by William Teuscher)



South wall of Chlorination Building. (Photographed September 22, 2011 by William Teuscher)



(Photographed September 22, 2011 by William Teuscher)



Air Pack



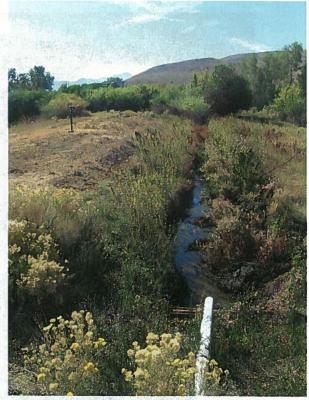
Outlet Structure from Lagoon Cell 2 to CL₂ Chamber (Photographed September 22, 2011 by William Teuscher)



V-Notch Weir outfall. Note no discharge (Photographed September 22, 2011 by William Teuscher)



Effluent pipe from weir structure to open ditch. (Photographed September 22, 2011 by William Teuscher)



Open effluent ditch flowing to outfall line (Photographed September 22, 2011 by William Teuscher)



Terminal end of outfall line to Big Lost River. No current discharge (Photographed September 22, 2011 by William Teuscher)



Effluent pipe in bottom left corner of photo to Big Lost River (Photographed September 22, 2011 by William Teuscher)



Evaporation Pan for Lagoon Leak Testing (Photographed September 22, 2011 by William Teuscher)



Weather gauge for Lagoon Leak Testing (Photographed September 22, 2011 by William Teuscher)